

Exhibit G

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Sent: Wednesday, May 25, 2022 12:45 PM
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Cc: NYWDml_Judge McCarthy's Chambers <NYWDml_Judge_McCarthy's_Chambers@nywd.uscourts.gov>
Subject: Moog v. Skyryse, 22-cv-187

Counselors – In fairness to defendants, I will give them until Friday to respond to Moog's motion [118]. I recognize that that is one of the production deadlines proposed by Moog, but I need to sort things out in an orderly way. However, a few preliminary comments/questions:

- 1. Hard deadline versus “substantially”** - While I understand Moog's desire for a hard and fast deadline, its suggestion that the parties may seek a “good cause” modification of the schedule could lead to further delay. Therefore, I suggest that we keep the word “substantially”, but define it to mean “in a manner that will not disrupt the briefing and argument schedule, with the burden of justification falling upon the party who fails to comply”.
- 2. Search terms** - Why do we need them? I thought we covered this in the discussion of the protocol.
- 3. Identification of trade secrets** - While Moog will have to identify them sufficiently in advance of the hearing to enable a proper defense, how can it be expected to do so now, when it does not yet know the full extent of what was taken?
- 4. Privilege review** – This was supposed to be ongoing long ago.



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